

1 ANTHONY L. HALL, ESQ.
Nevada Bar No. 5977
2 ahall@hollandhart.com
PETER D. NAVARRO, ESQ.
3 Nevada Bar No. 10168
pdnavarro@hollandhart.com
4 HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
5 Reno, Nevada 89511
Telephone: (775) 327-3000; Fax: (775) 786-6179

6 *Attorneys for Defendants*

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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 WILLIE THURMOND and DAVID
12 THOMAS, Individually and on behalf of
others similarly situated,

13 Plaintiff,

14 vs.

15
16 PRESIDENTIAL LIMOUSINE,
PRESIDENTIAL LIMOUSINE, A NEVADA
17 CORPORATION, and PRESIDENTIAL
LIMOUSINE CONCIERGE SERVICE, INC.,
18 and BRENT J. BELL,

19 Defendants.

CASE NO.: 2:15-cv-01066-MMD-PAL

**STIPULATION TO STAY ALL
PROCEEDINGS**

(Second Request)

20 Plaintiffs and Defendants, by and through their counsel of record, submit the below
21 stipulation to stay all proceeding in the above captioned matter. The purpose of this stay is to
22 allow the parties to engage in meaningful settlement discussions in an effort to fully and finally
23 resolve this dispute. As set forth herein, since the parties first request to stay was granted, their
24 negotiations have resulted in agreement to jointly mediate this case with a related case in an effort
25 to reach a global resolution as to both matters.

26 The parties therefore stipulate and agree that:

27 1. The above captioned dispute shall be stayed for a period of 68 days commencing on
28 May 11, 2016, and ending July 18, 2016 (the "Stay Period");

2. The Stay Period is calculated to allow this matter to be stayed for the same duration as a related matter before this Court, Case No. 2:16-cv-00305-JAD-PAL, *Cameron E. Oliver v. Bell Trans* ("Oliver Matter"). A stipulation to stay all proceedings in that matter was filed with the Court of April 21, 2016 and is currently set for a hearing on May 12, 2016. The parties are currently in the process of preparing for a joint mediation in an effort to reach a global resolution as to the instance matter and the Oliver Matter.

2. If the parties do not resolve this dispute during the Stay Period and do not request an additional stay from the Court to continue settlement negotiations, the parties agree to jointly submit a new Discovery Plan and Scheduling Order within seven (7) calendar days after the end of the Stay Period;

3. The forgoing request for stay is made in good faith to enable the parties to engage in meaningful settlement dialogue and not for the purpose of delay.

DATED this 11th day of May, 2016.

BY: /s/ Leon Greenberg, Esq.
LEON GREENBERG, ESQ.
NV Bar No. 8094
leongreenberg@overtimelaw.com
DANA SNIEGOCKI, ESQ.
NV Bar No. 11715
dana@overtimelaw.com
LEON GREENBERG PROFESSIONAL
CORPORATION
2965 South Jones Blvd – Suite E3
Las Vegas, Nevada 89146
Telephone: (702) 383-6085
Fax: (702) 385-1827

Attorneys for Plaintiffs

BY: /s/ Peter D. Navarro, Esq.
ANTHONY L. HALL, ESQ.
Nevada Bar No. 5977
ahall@hollandhart.com
PETER D. NAVARRO, ESQ.
Nevada Bar No. 10168
pdnavarro@hollandhart.com
HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511
Telephone: (775) 327-3000
Fax: (775) 786-6179

Attorneys for Defendants

IT IS SO ORDERED:



United States District Court Judge

Dated: May 16, 2016

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